



ATOCHEM NORTH AMERICA, INC.
17168 West Jefferson Avenue
Riverview, Michigan 48192-4270

Tel: (313) 285-9200

February 8, 1991

Data Entry Unit
Surface Water Quality Division
Michigan Department of Natural Resources
P. O. Box 30028
Lansing, Michigan 48909

Re: Atochem North America - Riverview Plant
NPDES Permit No. MI 0002381

The monthly Operating Report and the Discharge Monitoring Report for January are enclosed. Please note the following incident of apparent non-compliance which has been reported to the Surface Water Quality Division.

Outfall 001

Permit Limitation for BOD5: 2773 lbs./day Daily Maximum

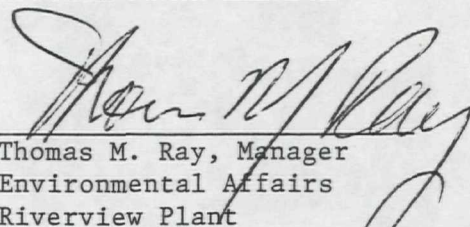
Indicated value on 1/24: 3142 lbs./day

The apparent incident was caused by a leak in the 21120 Reboiler which contaminated the condensate system. The reboiler was repaired and the operators have been retrained on the proper response to a reboiler leak to prevent condensate contamination. Alternative reboiler and steam trap design will also be investigated.

If there are any questions, please contact me.

Very truly yours,

ATOCHEM NORTH AMERICA


Thomas M. Ray, Manager
Environmental Affairs
Riverview Plant

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FEB 11 1991
COMP. & ENF

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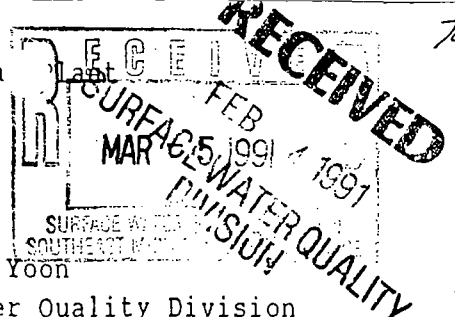
US EPA RECORDS CENTER REGION 5



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NPDES INCIDENT REPORT

Atochem North America - Riverview, Michigan
 17168 West Jefferson Avenue
 Riverview, Michigan 48192
 (313) 285-9200



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Hae Jin

To: Mr. Paul D. Zugger, Chief
 Surface Water Quality Division
 Department of Natural Resources
 P.O. Box 30028
 Lansing, Michigan 48909

Ms. Hae-Jin Yoon
 Surface Water Quality Division
 Department of Natural Resources
 38980 Seven Mile Road
 Livonia, Michigan 48152

ghrumb

Re: NPDES Permit No. MI 0002381
 Final Order of Abatement No. 1994

Date(s) of Incident(s) January 24, 1991 Outfall No. 001
 Outfall Characteristic(s) BOD5
 Permit Parameter(s) 2773 LB/DAY Maximum Loading
 Indicated Value 3142 LB/Day

Cause: A leak from 21120 Reboiler contaminated the high pressure
condensate tank and entered the west trunk sewer system. The
COD detector, which gives an early warning of BOD problems in
the plant sewers, was not functioning.

Duration: Unknown. 24 hr. composite

Corrective Action: Reboiler was shutdown when leak was identified.

Action to Prevent Recurrence: Reboiler has been repaired. The
COD detector for the sewer system was repaired and recalibrated.

NPDES INCIDENT REPORT

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Surface Water Quality Division
Department of Natural Resources
P.O. Box 30028
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Ms. Hae-Jin Yoon
Surface Water Quality Division
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38980 Seven Mile Road
Livonia, Michigan 48152

Re: NPDES Permit No. MI 0002381
Final Order of Abatement No. 1994

Date(s) of Incident(s) January 24, 1991 Outfall No. 001
Outfall Characteristic(s) BOD5
Permit Parameter(s) 2773 lb/day maximum loading
Indicated Value 3142 lb/day

Cause: A leak from 21120 Reboiler contaminated the high pressure
condensate tank and entered the west trunk sewer system. The contami-
nation of the condensate tank occurred when an inexperienced operator
improperly shut down the steam to the leaking reboiler.

Duration: Unknown. 24 hr. composite

Corrective Action: Reboiler was isolated from the system when leak was
identified.

Action to Prevent Recurrence: Reboiler has been repaired. The Operators
have been trained on the proper response when the condensate tank shows
contamination. Engineering will study alternative reboiler design to prevent
future leaks.